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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS BRIEF ON THE
DILIGENCED EMPLOYEES' WAIVER
OF ATTORNEY-CLIENT PRIVILEGE
FOR MATERIALS PROVIDED TO
THIRD-PARTY STROZ FRIEDBERG**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal (“Waymo’s Administrative Motion”) confidential information in its brief on the Diligenced Employees’ waiver of attorney-client privilege for materials provided to third-party Stroz Friedberg (“Waymo’s brief”). Waymo’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s brief	Highlighted in blue	Defendants and/or Anthony Levandowski
Exhibit 1 to Waymo's brief	Entire document	Defendants and/or Anthony Levandowski
Exhibit 2 to Waymo’s brief	Entire document	Defendants and/or Anthony Levandowski
Exhibit 3 to Waymo’s brief	Entire document	Defendants and/or Anthony Levandowski and/or other third-parties
Exhibit 4 to Waymo's brief	Entire document	Defendants
Exhibit 5 to Waymo's brief	Entire document	Defendants
Exhibit 6 to Waymo’s brief	Entire document	Anthony Levandowski
Exhibit 7 to Waymo’s brief	Entire document	Other third-party

3. Waymo’s Motion and exhibits contain information that Defendants and/or non-party Mr. Levandowski and/or other third-parties have designated as confidential and/or highly confidential.

4. Waymo takes no position on the merits of sealing the designated material and expects Defendants and/or Mr. Levandowski and/or other third-parties to file one or more declarations in accordance with the Local Rules.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on September 21,
3 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC

7 **SIGNATURE ATTESTATION**

8 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
9 filing of this document has been obtained from Lindsay Cooper.
10

11 /s/ Charles K. Verhoeven
12 Charles K. Verhoeven
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